

14:41:21 1 that would show every CO through which the customer's  
 14:41:25 2 circuit goes through?

14:41:28 3 A. There will be a circuit design, yes. It will  
 14:41:31 4 say what COs it travels through, yes.

14:41:39 5 Q. And that's provided to the customer?

14:41:40 6 A. Yes.

14:41:40 7 Q. And customers want that because they're more  
 14:41:42 8 and more sophisticated and they want to know the design  
 14:41:46 9 layout of their circuit?

14:41:48 10 A. That's correct.

14:41:48 11 Q. And one of the reasons they want to know that  
 14:41:51 12 is for the very diversity discussion we had a minute  
 14:41:55 13 ago, right?

14:41:56 14 A. They get their DLR for the design of the  
 14:41:59 15 circuit so they know where it is being dropped at their  
 14:42:02 16 premise primarily.

14:42:04 17 Q. And the more sophisticated ones also want to  
 14:42:07 18 know the route and path it's taking across the city,  
 14:42:09 19 right?

14:42:10 20 A. If they are inclined, yes.

14:42:13 21 Q. Because they may want to hook up and branch  
 14:42:16 22 off of that circuit, correct?

14:42:19 23 A. Well, you could not branch off of a  
 14:42:21 24 point-to-point circuit.

14:42:24 25 Q. Depending on what type of circuit or ring it

14:42:26 1 is?

14:42:27 2 A. Well, if it's a circuit, it's a point to  
14:42:29 3 point. If it's a ring, then they can only branch off at  
14:42:34 4 the nodes.

14:42:34 5 Q. And therefore they would want to know what  
14:42:37 6 those nodes are, correct?

14:42:39 7 A. Well, they place the order with us, so they do  
14:42:41 8 know the node locations.

14:42:43 9 Q. And you giving them back that information  
14:42:46 10 confirms that you have achieved those nodes, correct?

14:42:49 11 A. On the circuits being ordered on the SONET  
14:42:55 12 ring. They don't get a DLR for the SONET rings  
14:43:01 13 themselves.

14:43:01 14 Q. Do they get circuit information that  
14:43:04 15 identifies the nodes? That's what you said, right?

14:43:07 16 A. Right. I provide them. They know what nodes  
14:43:09 17 they have ordered. They know the COs they've ordered.  
14:43:12 18 They know the configuration at the nodes.

14:43:14 19 Q. You give them that route and path information,  
14:43:17 20 correct? It's not that hard.

14:43:18 21 A. I give them the node locations. I don't give  
14:43:21 22 them the path or the fibers used between the COs or to  
14:43:24 23 their premise.

14:43:25 24 Q. You don't give them a detailed block-by-block  
14:43:28 25 route information, but you tell them all the relevant

14:43:32 1 nodes, correct?

14:43:32 2 A. Yes, we do a drawing, yes.

14:43:41 3 Q. Can SWBT or any of your other carrier  
14:43:45 4 customers plan diversity of a circuit without knowing  
14:43:49 5 the route and path information of that circuit?

14:43:53 6 A. Can the carrier plan diversity? They can  
14:43:58 7 order a circuit diverse from an existing circuit.

14:44:03 8 Q. From you?

14:44:04 9 A. From Southwestern Bell, yes.

14:44:07 10 Q. But if they -- maybe they want to order that  
14:44:10 11 other circuit from you, maybe they don't, right?

14:44:12 12 A. Right.

14:44:14 13 Q. Can SWBT or any of your carrier customers plan  
14:44:20 14 diversity without knowing the route and path information  
14:44:21 15 of their circuit?

14:44:23 16 A. I mean, the carrier will have the -- they will  
14:44:27 17 know the circuit, the design layout or the circuit  
14:44:30 18 design of their circuit, because we provide them that  
14:44:34 19 via the DLR, so they could provide that to whomever they  
14:44:38 20 want to.

14:44:39 21 Q. Right. And my question is can SWBT or any  
14:44:42 22 other carrier plan diversity without having that route  
14:44:45 23 and path information?

14:44:47 24 A. No.

14:44:48 25 Q. Why not?

14:44:49 1 A. As we have said, if you know the nodes it goes  
 14:44:59 2 through, you would have to know the facilities that it's  
 14:45:02 3 riding. If you're designing a diverse circuit, you  
 14:45:06 4 would have to know the path -- the current path of the  
 14:45:10 5 other circuit.

14:45:10 6 Q. Otherwise you don't know if you're making it  
 14:45:13 7 different enough, do you?

14:45:14 8 A. That is correct.

14:45:15 9 Q. Okay. Now, you sell special access circuits,  
 14:45:18 10 correct?

14:45:18 11 A. Yes.

14:45:22 12 Q. And these are primarily to other carriers that  
 14:45:30 13 need local access service, correct?

14:45:31 14 A. I sell them to Qwest.

14:45:33 15 Q. You sell to Qwest because Qwest needs local  
 14:45:36 16 access circuits, correct?

14:45:38 17 A. What do you mean by local access circuits?

14:45:44 18 Q. Circuits in the metro area.

14:45:47 19 A. Access into the Southwestern Bell network.

14:45:50 20 Q. Right. Now -- so you're -- there you are  
 14:45:59 21 sitting in industry markets --

22 (Telephone interruption)

14:46:06 23 MR. CRAWFORD: Do I need to stop?

14:46:11 24 Q. There you are, Mr. Cunningham, sitting in  
 14:46:13 25 industry markets as a special access account manager

14:46:16 1 trying to sell Qwest circuits. Who is your competition  
 14:46:23 2 in this market for these type of circuits?  
 14:46:30 3 A. I don't go out and sell services to Qwest, per  
 14:46:35 4 se. They request access or services from Southwestern  
 14:46:39 5 Bell.  
 14:46:40 6 Q. Right.  
 14:46:40 7 A. I facilitate the implementation of their  
 14:46:43 8 orders.  
 14:46:43 9 Q. And these are primarily -- given Qwest's  
 14:46:47 10 business model, these are wholesale circuits, right?  
 14:46:50 11 A. Yes.  
 14:46:51 12 Q. For these wholesale circuits, who is SWBT's  
 14:46:54 13 primary competition?  
 14:46:55 14 A. I don't know who they --  
 14:46:57 15 Q. I mean, if you were to lose a sale on the  
 14:47:00 16 circuit to somebody, who would you lose it to?  
 14:47:02 17 A. I don't know.  
 14:47:02 18 Q. I mean, who else is in the business? You  
 14:47:05 19 don't even know who the competition is?  
 14:47:07 20 A. There can be CLECs. It can be to their --  
 14:47:11 21 another one of their portions of their company, so it  
 14:47:15 22 can be multiple people.  
 14:47:17 23 Q. Can you name one competitor for these  
 14:47:21 24 wholesale circuits that you have?  
 14:47:23 25 A. You can go Time-Warner.

14:47:25 1 Q. Okay. Can you name another one?

14:47:29 2 A. MFS.

14:47:33 3 Q. Can you name another one?

14:47:35 4 A. I mean, there are -- not off the top of my

14:47:46 5 head.

14:47:46 6 Q. Can you tell me the last time that you were

14:47:51 7 hoping to get a circuit order from Qwest, but you didn't

14:47:53 8 get it because it went to a competitor in this wholesale

14:47:58 9 market, wholesale circuit market?

14:48:05 10 A. I usually don't get orders unless they're

14:48:08 11 using us. I don't go out and sell, like I said,

14:48:14 12 service. I don't know when the last time was when I

14:48:18 13 lost a circuit.

14:48:19 14 Q. You don't know?

14:48:20 15 A. I don't know.

14:48:21 16 Q. Can you think of one time that you've lost a

14:48:24 17 circuit to a competitor? Can you think of one instance

14:48:31 18 sitting here today?

14:48:32 19 A. Can't identify one.

14:48:39 20 Q. Now, you testified earlier you're on

14:48:42 21 commission, correct?

14:48:42 22 A. Correct.

14:48:43 23 Q. But now you're also testifying that you don't

14:48:46 24 try and actively sell to Qwest?

14:48:48 25 A. I don't actively sell the lower level service,

14:48:51 1 the DS3s and the OCNs.

14:48:55 2 Q. Well, that wasn't what you said a second ago.

14:48:59 3 What do you actively sell to Qwest?

14:49:01 4 A. I actively sell, number one, SONET rings.

14:49:07 5 Q. You do go out there and visit them and call on

14:49:10 6 them and stuff?

14:49:11 7 A. Yes, I do.

14:49:12 8 Q. Play golf with them?

14:49:13 9 A. Not in a long time.

14:49:45 10 Q. What is the status of MFS right now?

14:49:49 11 A. I don't know.

14:49:50 12 Q. Are they in business? Did they go bankrupt?

14:49:53 13 MR. HARTLEY: Object to form.

14:49:57 14 A. I don't know their current status.

14:50:00 15 Q. Did you ever hear they went bankrupt?

14:50:03 16 A. No.

14:50:27 17 Q. Are you aware of any other special access

14:50:30 18 account manager losing a prospective circuit sale to a

14:50:35 19 competitor?

14:50:35 20 A. Not aware of it.

14:50:45 21 Q. Pardon?

14:50:46 22 A. Not aware of it.

14:50:47 23 Q. Are you familiar with Time-Warner's wholesale

14:50:51 24 footprint for wholesale circuits?

15:05:53 25 A. No, I'm not.

14:50:54 1 Q. Do you know if it's very large or not?

14:50:56 2 A. No.

14:50:57 3 Q. Did you ever go head to head with Time-Warner  
14:51:01 4 or MFS on a bid situation or a particular circuit sale?

14:51:04 5 A. No, not to my knowledge.

14:51:06 6 Q. Can you name one competitor that you've gone  
14:51:09 7 head to head with in a bid situation or a competitive  
14:51:13 8 circuit sale?

14:51:18 9 A. I have not done any competitive bids to my  
14:51:22 10 knowledge.

14:51:30 11 Q. What is SWBT's process for replacing fibers  
14:51:34 12 that are found to be defective?

14:51:36 13 A. I have no knowledge.

14:51:42 14 Q. Does Qwest ever call you and say, we are  
14:51:45 15 having a problem with one of our circuits?

14:51:49 16 A. No.

14:51:55 17 Q. Have you ever heard the terms intrusive  
14:51:59 18 testing or non-intrusive testing?

14:52:02 19 A. Yes.

14:52:03 20 Q. Can you explain to me the difference between  
14:52:07 21 intrusive testing and non-intrusive testing?

14:52:11 22 A. Intrusive is when the circuit has to be taken  
14:52:15 23 down to be tested. Non-intrusive, the circuit continues  
14:52:19 24 and you're monitoring it.

14:52:21 25 Q. What kind of monitoring?



14:52:26 1 A. If it's looking at a fiber signal, you can see  
 52:32 2 if there's a signal coming through.  
 14:52:39 3 Q. What process does SWBT follow for intrusive  
 14:52:42 4 testing?  
 14:52:43 5 A. I do not know.  
 14:52:44 6 Q. How about non-intrusive testing?  
 14:52:49 7 A. I don't know.  
 14:52:50 8 Q. Have you ever had to do intrusive testing on a  
 14:52:52 9 Qwest circuit?  
 14:52:53 10 A. I have never.  
 14:52:54 11 Q. Let me rephrase that. Have you ever been  
 14:52:56 12 involved in a situation where one of Qwest's circuits  
 14:52:59 13 needed intrusive testing?  
 14:53:06 14 A. No.  
 14:53:17 15 Q. When we were talking about TIRKS, you said  
 14:53:21 16 that you needed a certain identification or you used the  
 14:53:25 17 access carrier termination location code to pull up a  
 14:53:29 18 circuit; is that correct?  
 14:53:32 19 A. You can use that to find the facilities to  
 14:53:34 20 that location.  
 14:53:36 21 Q. Okay. You're not required to have an CLLI  
 14:53:45 22 code, are you?  
 14:53:48 23 A. CLLI and ACTL codes are sometimes  
 14:53:52 24 interchangeable.  
 53:55 25 Q. Sometimes they're different?

14:53:57 1 A. Usually the CLLI code is for the central  
14:54:00 2 office. The ACTL code is for the carrier or the  
14:54:04 3 customer premise.

14:54:05 4 Q. Then they shouldn't be the same number, should  
14:54:07 5 they?

14:54:08 6 A. They would not be.

14:54:10 7 Q. Okay. So the CLLI code is different from an  
14:54:13 8 ACTL code?

14:54:14 9 A. Yes, but, like I said, the terminology is used  
14:54:20 10 interchangeably if somebody says look at my CLLI code  
14:54:23 11 for my location when it's a customer location.

14:54:27 12 Q. So they may say CLLI, but they may be using  
14:54:33 13 the term because CLLI is a central office designation?

14:54:37 14 A. To my knowledge, yes.

14:54:41 15 Q. Now, if you didn't have an ACTL and you didn't  
14:54:43 16 have a CLLI, how would you find out fiber to a location  
14:54:46 17 or --

14:54:47 18 A. If there is no CLLI code or ACTL code  
14:54:51 19 associated with that location?

14:54:52 20 Q. If you didn't have it.

14:54:54 21 A. I don't have it.

14:54:55 22 Q. If you don't have access to the CLLI code or  
14:54:57 23 the ACTL code, how would you find out what fibers are  
14:55:01 24 lit to a building, for instance?

14:55:02 25 A. I wouldn't know how to determine if there's

14:55:05 1 fiber or anything to that location.

14:55:06 2 Q. You would need an ACTL or a CLLI?

14:55:09 3 A. (Nods head) To know if there's facilities to  
14:55:17 4 that location.

14:55:18 5 Q. There may be other ways of doing it, you're  
14:55:21 6 just saying you don't know how to do it?

14:55:24 7 A. Correct.

14:55:27 8 Q. How do you find out the CLLI code on a piece  
14:55:30 9 of equipment or a CO?

14:55:32 10 A. Well, we have a local exchange routing guide  
14:55:35 11 that provides the CLLI codes for the -- the central  
14:55:40 12 offices.

14:55:40 13 Q. Uh-huh.

14:55:42 14 A. There is a CLLI lookup that you can look at  
14:55:47 15 addresses to see what codes are available there.

14:55:53 16 Q. Okay. So if I put in 1717 Main into the CLLI  
14:55:57 17 lookup, what would I get?

14:56:01 18 A. You may or may not hit a match. I would  
14:56:05 19 assume here you may get a listing of all the CLLI codes  
14:56:09 20 at that address, or ACTL codes.

14:56:11 21 Q. Okay. Well, let's say I put in a small POP.  
14:56:20 22 What am I going to get back?

14:56:26 23 A. I would assume if it was a POP with services,  
14:56:30 24 there would be an ACTL code established there.

14:56:35 25 Q. If I put a CO into the CLLI code lookup, what

14:56:41 1 do I get? Every CLLI code at that CO?

14:56:44 2 A. At that address, yes.

14:56:45 3 Q. What other identifying information?

14:56:47 4 A. Customer names.

14:56:50 5 Q. At the CO?

14:56:51 6 A. If there's collocations there, yes.

14:56:55 7 Q. Okay. So it would also show you everyone that

14:57:01 8 was collocated there?

14:57:04 9 A. Yes.

14:57:04 10 Q. Would it give me a different location for the

14:57:09 11 CLLI code or circuits?

14:57:11 12 A. I don't know what all is loaded into a CLLI

14:57:14 13 lookup.

14:57:15 14 Q. Is that web based, CLLI Lookup?

14:57:17 15 A. Yes.

16 Q. Database?

17 A. Yes.

14:57:17 18 Q. Is that available to special access account

14:57:19 19 managers?

14:57:20 20 A. Yes.

14:57:22 21 Q. And you can -- so you can -- it is possible to

14:57:26 22 find CLLI codes by physical street address?

14:57:30 23 A. Yes.

14:57:31 24 Q. If I were to put a suite number in, even more

14:57:37 25 narrow search, would it then pull up the CLLIs that are

14:57:41 1 identified with this suite?

14:57:48 2 A. It would depend on how its loaded into the  
14:57:53 3 database.

14:57:53 4 Q. Right. You certainly could start with the  
14:57:57 5 physical address and work your way down to the suites,  
14:58:00 6 right?

14:58:00 7 A. And if it's loaded, you could find out who's  
14:58:03 8 there. If it's not loaded -- more times than not, it's  
14:58:08 9 not.

14:58:08 10 Q. But if I have a bunch of CLLIs, how would I be  
14:58:13 11 able to tell a MUX from a circuit? What other  
14:58:18 12 identifying information is on there?

14:58:19 13 A. The ACTL code is just giving you the facility  
14:58:23 14 termination location. It's not saying what services are  
14:58:26 15 there. It's saying there's an ACTL code for that  
14:58:30 16 location or for that customer.

14:58:32 17 Q. Okay. So if I put in Qwest's POP, that street  
14:58:38 18 address, it's going to give me a single ACTL code?

14:58:42 19 A. If you put in their -- I mean, if it's a  
14:58:45 20 single tenant building --

14:58:48 21 Q. Start there, yes.

14:58:50 22 A. -- then you would get -- if there was an ACTL  
14:58:53 23 code established for that location, then you would  
14:58:58 24 get -- you can have switched ACTLs and special ACTLs, so  
14:59:05 25 there could be two ACTLs for that location for that

14:59:08 1 customer.

14:59:09 2 Q. Okay. So if all you have is a street address,  
14:59:12 3 you go to your CLLI Lookup database, you put in the  
14:59:16 4 street address, it would report back to you the ACTL  
14:59:19 5 you're looking for, correct?

14:59:21 6 A. Possibly.

14:59:23 7 Q. Most likely?

14:59:25 8 A. May; may not.

14:59:27 9 Q. Well, it's possible --

14:59:29 10 A. It might not. For Qwest's POP, yes.

14:59:32 11 Q. Yes, you're going to get it, right?

14:59:35 12 A. Yes.

14:59:35 13 Q. You take the ACTL and put it in TIRKS and it  
14:59:38 14 will provide you all service to that street address  
14:59:42 15 based on that ACTL code?

14:59:43 16 A. You could.

14:59:44 17 Q. Is that correct?

14:59:44 18 A. Well, possibly.

14:59:49 19 Q. Most likely. That's the whole purpose of the  
14:59:51 20 system, right?

14:59:52 21 A. Well, CLLI Lookup gives you the ACTL code for  
14:59:57 22 that customer location. It doesn't necessarily give you  
15:00:01 23 the equipment code for that location.

15:00:05 24 Q. Right, but if I had the -- if the CLLI Lookup  
15:00:09 25 gives me the ACTL code and I put the ACTL code in TIRKS,

15:00:14 1 it will at least show me or is supposed to show me all  
00:18 2 lit fibers to that location, correct?

15:00:20 3 A. No. It would give you the services that are  
15:00:23 4 terminated with that as A and Z channelized services.

15:00:31 5 Q. Channelized fiber services?

15:00:33 6 A. Channelized, DS3s, DS1s.

15:00:35 7 Q. So it would give you all the lit service?

15:00:39 8 A. No. It gives you the channelized services.

15:00:41 9 Q. What are the channelized services?

15:00:44 10 A. DS1s, DS3s. If the OC-48 has a designation  
15:00:50 11 with that 11-character CLLI code or ACTL code, it would  
15:00:55 12 get that, but it would not necessarily tell you the  
15:01:04 13 facilities to that location.

15:01:25 14 MR. CRAWFORD: Can we take a quick,  
15:01:27 15 five-minute break?

15:01:31 16 (Recess 3:01 to 3:10 p.m.)

15:10:09 17 Q. Mr. Cunningham, have you ever heard of a MON  
15:10:16 18 service, M-O-N?

15:10:18 19 A. Just heard of it. It's not a product I offer.

15:10:21 20 Q. It's not offered to your customers?

15:10:24 21 A. Not to my customer Qwest as an account access  
15:10:37 22 service manager.

15:10:38 23 Q. Why is that?

15:10:39 24 A. It's a retail product.

10:40 25 Q. Some special access account managers sell

15:10:45 1 retail, right?

15:10:47 2 A. Yes.

15:10:48 3 Q. Okay. So are they selling MON?

15:10:53 4 A. It's a product offering of Southwestern Bell,

15:10:56 5 so --

15:10:56 6 Q. It is on the market now?

15:11:00 7 A. I don't know one way or the other. Like I

15:11:03 8 said, I've seen that -- seen the word MON.

15:11:07 9 Q. To your understanding, is it any different

15:11:11 10 than what you're selling right now?

15:11:14 11 A. I haven't compared MON versus the tariff

15:11:19 12 services that I offer.

15:11:22 13 Q. Right. Did you know that MON has POP-to-POP

15:11:32 14 applications?

15:11:32 15 A. I did not know that.

15:11:37 16 Q. Do you even know what it's going to offer?

15:11:40 17 A. No, I don't.

15:12:02 18 Q. We talked about TIRKS, WALRSS, EXACT, LEX,

15:12:08 19 LASAR. What other databases do you have available to

15:12:11 20 you --

15:12:11 21 MR. HARTLEY: Object to form.

15:12:13 22 Q. -- Mr. Cunningham?

15:12:19 23 A. What type of databases are you looking for?

15:12:25 24 Q. I assume TIRKS is accessible to your PC?

15:12:29 25 A. Yes.



15:12:29 1 Q. And that PC sits on your desk?

15:12:32 2 A. Yes.

15:12:33 3 Q. WALRSS is on your PC?

15:12:35 4 A. Yes.

15:12:37 5 Q. What other database or informational programs

15:12:43 6 do you have access to from your PC that provides you any

15:12:48 7 type of information on SWBT's facilities?

15:12:52 8 A. I have a web based tool called Toolbar, which

15:12:58 9 is available to the carriers, and I have LATTIS Pro.

15:13:05 10 Q. Will you spell that, please?

15:13:07 11 A. L-A-T-T-I-S Pro.

15:13:10 12 Q. Okay.

15:13:10 13 A. It's a pricing tool.

15:13:16 14 Q. What is this CLLI Lookup function called?

15:13:21 15 A. CLLI Lookup, C-L-L-I L-O-O-K-U-P.

15:13:28 16 Q. The program is called CLLI Lookup?

15:13:31 17 A. That's the address on the website.

15:13:33 18 Q. So it's a web based program?

15:13:35 19 A. Yes.

15:13:38 20 Q. Do you have to put in a password to get into

15:13:41 21 that?

15:13:41 22 A. No.

15:13:44 23 Q. Do you have to put a password in to get to

15:13:48 24 TIRKS?

15:49 25 A. Yes.

15:13:56 1 Q. Now, CLLI Lookup is supposed to give you a  
 14:02 2 CLLI once you give it certain information, correct?  
 15:14:04 3 A. If it finds a match.  
 15:14:06 4 Q. Right. What information does it accept to go  
 15:14:09 5 look for a CLLI?  
 15:14:11 6 A. I mean, the entries are address, street, city.  
 15:14:20 7 I mean, it's --  
 15:14:23 8 Q. Are they all required fields or do you just  
 15:14:26 9 put in as much information as you have?  
 15:14:31 10 A. There are no required fields.  
 15:14:35 11 Q. If I put Main Street, Dallas, is it going to  
 15:14:39 12 give me every CLLI that tracks into Main Street, Dallas?  
 15:14:44 13 A. It might come back -- I don't know. It might  
 15:14:46 14 come back with --  
 15:14:47 15 Q. It might?  
 15:14:48 16 A. It might find a match or it may say no.  
 15:14:55 17 Q. It generally works off of physical address?  
 15:14:57 18 A. Yes.  
 15:15:01 19 Q. And then one of the reasons people use the  
 15:15:05 20 CLLI Lookup program is they then take the CLLI code and  
 15:15:10 21 put that into TIRKS or some other database?  
 15:15:14 22 A. I use CLLI Lookup for whatever facilities are  
 15:15:17 23 not available.  
 15:15:18 24 Q. Right.  
 15:18 25 A. So I can see if what the ACTL code is to that

15:15:22 1 location to that customer, which I would then put into  
15:27 2 the WALRSS case.

15:15:31 3 Q. So you're talking about when the NSS came back  
15:15:33 4 and said facilities are not available?

15:15:35 5 A. Yes.

15:15:35 6 Q. Then you would resubmit with the ACTL code?

15:15:38 7 A. The WALRSS case, or I have to request an ACTL  
15:15:43 8 code.

15:15:44 9 Q. So the NSS says we don't have facilities  
15:15:46 10 available for your WALRSS request; you would sort of  
15:15:50 11 appeal it, so to speak, by finding an ACTL code, if  
15:15:53 12 there is one for that physical location, and say, look  
15:15:57 13 guys, look at this. Try again?

15:15:59 14 A. That's one option.

15:16:06 15 Q. But another function is that people could then  
15:16:09 16 get the CLLI out of the CLLI Lookup software and put it  
15:16:13 17 in the TIRKS and seek even more information?

15:16:16 18 A. You could get more information in TIRKS.

15:16:19 19 Q. Once you have the CLLI code?

15:16:22 20 A. Yes.

15:16:22 21 Q. Okay. What other databases do you have  
15:16:26 22 available to you?

15:16:38 23 A. That's all that I have in my laptop or desk  
15:16:43 24 top.

16:45 25 Q. What does Toolbar do?

15:16:49 1 A. Toolbar is a tool that provides trouble  
17:02 2 reporting for carriers. It provides trouble tickets  
15:17:12 3 reporting and, I guess, billing information.

15:17:20 4 Q. Okay. What is LATTIS Pro?

15:17:23 5 A. That's the pricing tool.

15:17:25 6 Q. What do you mean by pricing tool?

15:17:26 7 A. You can put in the two -- the wire centers or  
15:17:35 8 the wire center if it's a MUX circuit, and it will  
15:17:42 9 provide the pricing -- the tariff pricing for the  
15:17:45 10 services, DS3, OCN service.

15:17:51 11 Q. So you put, you say, a wire center and a  
15:17:53 12 customer premise in?

15:17:55 13 A. You don't put the customer prem; you put the  
15:17:59 14 serving wire center. It would price out to the  
15:18:05 15 chan-term the mileage, if it's applicable, and another  
15:18:09 16 chan-term if it's a point to point.

15:18:11 17 Q. For every loop coming out of that CO or that  
15:18:15 18 wire center?

15:18:16 19 A. Right.

15:18:16 20 Q. Are they mileage based pricing?

15:18:19 21 A. Or flat prices. Interoffice is mileage based,  
15:18:24 22 chan-term is non-mileage sensitive.

15:18:27 23 Q. Chan-term you mean loop -- is another word for  
15:18:31 24 chan-term, correct?

18:31 25 A. Yes.

15:18:31 1 Q. And that's a flat rate out of that wire  
 15:18:34 2 center?  
 15:18:35 3 A. Correct.  
 15:18:36 4 Q. Any other databases available to you not on  
 15:18:39 5 your PC?  
 15:18:40 6 A. I mean, we have the hubbing and bridging guide  
 15:18:43 7 that's available and the carrier coding guide.  
 15:18:48 8 Q. Carrier code guide?  
 15:18:51 9 A. Coding guide.  
 15:18:52 10 Q. What was the first one you said?  
 15:18:54 11 A. The hubbing and bridging guide.  
 15:18:55 12 Q. What is hubbing and bridging?  
 15:18:58 13 A. It gives the information on where hubbing and  
 15:19:07 14 bridging functionality is available based on the office  
 15:19:17 15 type.  
 15:19:18 16 Q. And give me the short form version of what  
 15:19:21 17 hubbing and bridging is.  
 15:19:23 18 A. If you wanted to provide a DS1 to a customer  
 15:19:31 19 served out of another wire center and you have a MUX in  
 15:19:38 20 the -- in another location, a DS3 that's being MUX'd  
 15:19:42 21 down to DS1, and you just want to extend that DS1 to  
 15:19:48 22 that customer, the hubbing and bridging guide would give  
 15:19:51 23 you if that central office that serves your end user is  
 15:19:58 24 hubbed off of your -- where you have your multiplexer.  
 20:02 25 Q. Are you talking about a situation where, say,

15:20:06 1 you want to service a DS1 and there's an available DS1  
15:20:12 2 port in the non-serving wire center, that you would just  
15:20:17 3 loop it through the serving wire center?

15:20:19 4 A. No. It gives the -- it would give the --  
15:20:27 5 where we have connectivity, where facilities have been  
15:20:32 6 designed to aggregate traffic, so to speak, from certain  
15:20:41 7 end offices. It's not saying you have spare capacity or  
15:20:47 8 like your local loop available.

15:20:51 9 Q. So you're talking about a CO that other COs  
15:20:53 10 sort of feed into?

15:20:54 11 A. Yes.

15:20:54 12 Q. And then you're going to serve from that hub  
15:20:57 13 CO a DS1 to a customer prem that's where? On the other  
15:21:01 14 side of one of the other COs, that's going to run  
15:21:04 15 through that other CO?

15:21:06 16 A. Yes.

15:21:07 17 Q. Okay. And the MUX is in the hub CO, not in  
15:21:11 18 the serving wire center, even though the DS1 may go  
15:21:16 19 through the serving wire center?

15:21:20 20 A. You could order it back through the serving  
15:21:24 21 wire center.

15:21:25 22 Q. Or can you just go around the serving wire  
15:21:29 23 center?

15:21:29 24 A. You can -- the service may be from -- say the  
15:21:35 25 DS3 goes from the POP through the serving wire center to

15:21:40 1 a hub location, and then you look at DSIs or offices  
 21:43 2 that sub to that central office or that aggregate to it.

15:22:17 3 Q. You used the -- well, the term serving wire  
 15:22:20 4 center. Can you tell me what that is?

15:22:23 5 A. It's the office that serves or provides dial  
 15:22:28 6 tone for end users in that location.

15:22:31 7 Q. Okay. Does dial tone have much impact on your  
 15:22:34 8 business?

15:22:34 9 A. Not dial tone, no.

15:22:37 10 Q. No. For purposes of special access circuits,  
 15:22:41 11 does it matter which wire center you're running the loop  
 15:22:45 12 to?

15:22:47 13 A. Can you restate the question a little bit?

15:22:50 14 Q. Yes. You talked about serving wire center.

15:22:53 15 For what you do, high capacity, special access circuits,  
 15:22:56 16 does it matter which -- technologically does it matter  
 15:23:03 17 which wire center you're running the loop -- you're  
 15:23:06 18 connecting the customer premise to?

15:23:08 19 A. Well, you run from the customer premise  
 15:23:14 20 through the service wire center to the location.

15:23:16 21 Q. That's not always the case though, is it?

15:23:19 22 A. To my knowledge it is, yes.

15:23:21 23 Q. Well, you've never seen a situation where they  
 15:23:23 24 don't run -- let's step back. We talked earlier about  
 23:27 25 diversity where the customer's ring would go through

15:23:31 1 both the -- what you call the serving wire center and  
 15:23:34 2 another wire center, correct?

15:23:37 3 A. Yes.

15:23:38 4 Q. Okay. Have you ever seen a situation where  
 15:23:41 5 the customer prem's fiber ran only to a non-serving wire  
 15:23:47 6 center and that there was no fiber running to the  
 15:23:52 7 serving wire center?

15:23:53 8 A. No.

15:23:53 9 Q. You've never seen that before?

15:23:55 10 A. No.

15:23:55 11 Q. Certainly that could happen, correct,  
 15:23:58 12 technologically?

15:24:03 13 A. Technically, yes.

15:24:04 14 Q. I mean, from a network planning perspective,  
 15:24:08 15 it doesn't matter? As long as it gets to a CO or a wire  
 15:24:11 16 center, it doesn't matter whether it gets to the serving  
 15:24:15 17 CO or wire center, does it?

15:24:17 18 A. Like I said, that would be the call of the  
 15:24:20 19 planners, but I would assume everything from the serving  
 15:24:24 20 wire center goes through that serving wire center.

15:24:27 21 Q. I understand that, but if it didn't, if it  
 15:24:30 22 went to a different wire center, would the fiber not  
 15:24:34 23 work?

15:24:38 24 A. Technically the fiber would work.

15:24:40 25 Q. I mean, the serving designation is really sort



15:24:44 1 of left over from the voice dial tone days, right?

24:48 2 A. That's still used today.

15:24:52 3 Q. It's language that's used today by SWBT

15:25:03 4 people, right?

15:25:03 5 A. Yes.

15:25:12 6 Q. And certainly fiber that runs through a

15:25:14 7 non-serving CO works just fine; that's why you include

15:25:18 8 it as part of the SONET ring, correct?

15:25:22 9 A. You include it for diversity.

15:25:25 10 Q. Right. It works just fine to run customers'

15:25:32 11 fiber to a non-serving wire center; isn't that correct?

15:25:40 12 A. I mean, the fiber, the system works fine.

15:25:44 13 Q. Yes. That's correct, isn't it?

15:25:45 14 A. Yes.

15:25:55 15 Q. When we talked about diversity in establishing

15:25:57 16 a path to a wire center other than the serving wire

15:26:05 17 center, we were talking about fiber based paths,

15:26:08 18 correct?

15:26:09 19 A. We were talking about SONET rings.

15:26:13 20 Q. Right. SONET rings are always on fiber,

15:26:17 21 correct?

15:26:17 22 A. Yes.

15:26:18 23 Q. Do you ever have occasion to do a -- arrange a

15:26:24 24 DS1 with diversified paths?

26:26 25 A. I have not.